

Research and Special Programs Administration

SEP 2 3 1999

Mr. C. Vleugels VanHool N.V. Bernard Van Hoolstraat 58 B-2500 Lier Koningshooikt Belgium

Dear Mr. Vleugels:

This is in response to your letter dated June 25, 1999, requesting clarification on determining whether your material, Sodium Sulfide, UN 1849, is a "flowable" or a "non-flowable" solid as it relates to provisions in § 173.32c (g)(2) of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180).

As used in § 173.32c(g)(2), a "flowable" solid is a solid material (e.g., crystal, powder, pellet, etc.) that moves in a smooth and uninterrupted movement through the valves of a tank. Sodium Sulfide in its crystal or powder form is considered a "flowable" solid if it flows freely through the valves. A "non-flowable" solid is a solid material in a cake or other solid form that does not flow in a smooth and uninterrupted movement through the tank valves. If moisture affects your material causing clumping or other solidification that interrupts free flow or movement through the valves of the tank, your material is considered a "non-flowable" solid.

I hope this answers your inquiry.

Sincerely,

Delmer F. Billings

Chief, Standards Development

Office of Hazardous Materials Standards

990175

171.8

400 Seventh Street, S.W.

Ref. No. 99-0175

Washington, D.C. 20590



99-0175

Bus and trailer manufacturers

Department:

SB IV

Extension:

3414

Contact:

C. Vleugels

Our reference:

ET/CV/ds - 99/297

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400 Seventh Street, S.W. WASHINGTON D.C. 20590

USA

For the attention of Mr. Billings

Lier, the 25th June, 1999

Your letter: ref. no. 99-0062

Dear Mr. Billings

Could you please explain us how we can determine whether a certain solid (UN 1849 -Sodium Sulfide) is a "flowable" or a "non-flowable" solid, especially in the context of provision § 173.32c (g) (2).

We thank you in advance for your help and remain,

with kind regards VAN HOOL N.V.

C. VLEUGELS

ir. E. TAEYMANS

Technical Manager